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January 16, 2025

BY ECF

Honorable Judge John P. Cronan
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

**Re: Cuccia v. HF Management Services LLC d/b/a Healthfirst, Inc. et al.
1:24-cv-02091 (JPC)**

Dear Judge Cronan:

The undersigned counsel to Plaintiff Heather Cuccia is the above-referenced matter. Plaintiff respectfully submits this letter jointly with Defendant Healthfirst Inc. in response to the Court's Order of January 16, 2025. The reason the parties request that expert discovery take place after summary judgment motions is that, due to the nature of the case at bar, expert discovery goes only to damages, not liability. Conducting it prior to summary judgment thus runs the risk of the parties expending resources to secure expert testimony on issues that are then precluded in summary judgment. The parties thus respectfully request that expert discovery be scheduled afterwards.

We thank the Court for its time and attention to this matter.


Respectfully submitted,

/s/ Megan Goddard, Esq.
Megan S. Goddard, Esq.

The Court thanks the parties for their additional explanation. The Court will enter the proposed Case Management Plan and Scheduling Order. The Clerk of Court is respectfully directed to close Docket Number 40.

SO ORDERED.

Date: January 17, 2025
New York, New York


JOHN P. CRONAN
United States District Judge